

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: REGINALD RINALDO TALTON,	:	Chapter 13
Debtor(s),	:	Case No. 5:23-bk-00289-MJC
WESTLAKE SERVICES, LLC,	:	
Movant,	:	Motion for
v.	:	Relief from Stay
REGINALD RINALDO TALTON and	:	
JACK N. ZAHAROPOULOS, TRUSTEE,	:	
Respondent(s),	:	

**ANSWER TO MOTION OF
WESTLAKE SERVICES FOR RELIEF FROM STAY**

AND NOW COMES Debtor(s) **REGINALD RINALDO TALTON**, by and through their attorneys, J. ZAC CHRISTMAN, ESQUIRE, and in Answer to the Motion of **WESTLAKE SERVICES** for Relief from Stay aver(s):

1. Admitted.
2. Denied to the extent the document referenced does not speak for itself.
3. Denied to the extent the document referenced does not speak for itself.
4. Admitted.
5. Admitted in part and Denied in part. Upon information and belief, the Trustee was appointed by the United States Trustee.
6. Admitted.
7. Admitted in part and Denied in part. Debtor reasonably believes he made some payments in 2023, but does not contest that there are significant arrears.
8. Denied. Debtor reasonably believes the vehicle has value greater than the amount allegedly due indicated in paragraph 7. Debtor is investigating the sale or trade-in of the vehicle that might result in payment in full to Movant.

9. Denied to the extent the averments of paragraph 9 are other than statements or conclusions of law or a misplaced request for relief that do not require a response.

10. Denied to the extent the averments of paragraph 10 are other than statements or conclusions of law or a misplaced request for relief that do not require a response. Based on the value of the vehicle, Debtor does not believe that such extraordinary relief is appropriate.

WHEREFORE, Debtor(s) **REGINALD RINALDO TALTON** respectfully pray(s) this Honorable Court for an Order that the Motion of **WESTLAKE SERVICES** for Relief from Stay be Denied, or, in the alternative, that the Stay be conditioned on continuing future payments, and for such other and further relief as the Honorable Court deems just and appropriate.

Respectfully Submitted,

/s/ J. Zac Christman

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